

Applicants have filed a Notice of Appeal for the purpose of avoiding abandonment.

It is the purpose of this Second Request for Reconsideration to avoid the need for filing an Appeal Brief, and thereby unnecessarily using the resources and time of the U.S. Patent and Trademark Office, as well as Applicants' time, in pursuing the appeal process. An Examiner's response to a timely-filed Request for Reconsideration is provided for in Section 714.13 of the MPEP.

The original Request for Reconsideration essentially repeated Applicants' arguments in the response to the Final Rejection mailed April 7, 2006.

The arguments previously presented by Applicants in the original Request for Reconsideration and in the response to the Final Rejection of April 7, 2006, will not be repeated again here. In summary, however, it is emphasized that reference patent 5,887,670, taken alone or in combination with reference patent 5,846,155, does not disclose a powertrain with a traction motor that achieves reverse drive by isolating the motor from the power delivery path between the engine and the generator. In the case of the embodiment of Applicants' Figure 2, the motor is isolated by releasing clutch 62 and applying brake 60 so that ring gear 48 can act as a reaction element as the engine drives the generator to charge the battery. Claims 1, 4, 6, 7 and 9 define the embodiment of Figure 2.

In the case of the embodiment of Applicants' Figure 3, the motor is isolated by releasing clutch 90. Clutch 88, when it is engaged, locks-up the planetary gear unit so that the engine can drive the generator to charge the battery during reverse drive. Claims 2, 3, 5-8 and 10 define the embodiment of Figure 3.

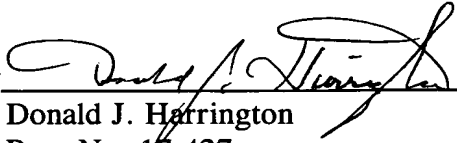
Claim 11 is a generic claim that defines both the embodiment of Figure 2 and the embodiment of Figure 3.

As previously pointed out, the '670 reference patent discloses a hybrid drive system in which reverse drive is achieved in a conventional manner by an automatic transmission 18. Further, there is only a single electric machine disclosed in the '670 patent, not two (motor and generator) as in Applicants' invention.

It is impossible to make an element-by-element comparison between Applicants' claimed invention and the reference teachings.

Respectfully submitted,

JOSEPH G. SUPINA et al.

By 
Donald J. Harrington
Reg. No. 17,427
Attorney/Agent for Applicant

Date: August 16, 2006

BROOKS KUSHMAN P.C.
1000 Town Center, 22nd Floor
Southfield, MI 48075-1238
Phone: 248-358-4400
Fax: 248-358-3351